

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAQUEL GRINDLEY,)	
)	
Plaintiff,)	Civil Action File No.
)	
vs.)	
)	
HALSTED FINANCIAL SERVICES, LLC,)	
)	
Defendant.)	
_____)	

DEFENDANT’S NOTICE OF REMOVAL

TO:

United States District Court for the
Northern District of Georgia, Atlanta
Division

Raquel Grindley
c/o Jason Tenenbaum
Tenenbaum Law Group, PLLC
1600 Ponce De Leon Blvd.
10th Floor
Coral Gables, Florida 33134

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §§ 1446(a) and (b), the Defendant Halsted Financial Services, LLC (“Defendant”) hereby removes this case to the United States District Court for the Northern District of Georgia, Atlanta Division based on the following grounds:

1. This action is removable to the United States District Court under 28 U.S.C. §§ 1331 and 1441 on the grounds of federal question jurisdiction, in that the

complaint purports to allege a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §1692, *et seq.*

2. Pursuant to 28 U.S.C. § 1446(b), this Notice of Removal is filed within thirty days after Defendant's receipt of the initial pleadings setting forth the claim for relief upon which this action is based.

3. Pursuant to 28 U.S.C. § 1446(a), attached hereto as Exhibit "A" are copies of the following documents, which are all the process and pleadings.

4. Upon receipt of this Notice, no further action shall be taken in the Magistrate Court of Fulton County, State of Georgia.

5. By filing this Notice of Removal, the Defendant demonstrates its consent to the removal of the case to this Court.

Respectfully submitted this 26th day of May 2023.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust

Jonathan K. Aust
Georgia Bar No. 448584
John H. Bedard, Jr.
Georgia Bar No. 043473
Counsel for Defendant

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vs.)	
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HALSTED FINANCIAL SERVICES, LLC,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing Defendant's Notice of Removal by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to:

Jason Tenenbaum
Tenenbaum Law Group, PLLC
1600 Ponce De Leon Blvd.
10th Floor
Coral Gables, Florida 33134

Respectfully submitted this 26th day of May 2023.

BEDARD LAW GROUP, P.C.

/s/ Jonathan K. Aust
Jonathan K. Aust
Georgia Bar No. 448584
John H. Bedard, Jr.
Georgia Bar No. 043473
Counsel for Defendant